Case 2:24-cv-01745-RAJ Document 39 Filed 12/31/24 Page 1 of 3 The Honorable Judge Richard A. Jones 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 PRASANNA SANKARANARAYANAN, ) 9 No. 2:24-cv-01745-RAJ **10** Petitioner, 11 [PROPOSED] STIPULATED ORDER VS. 12 **13** DHIVYA SASHIDHAR, 14 Respondent. 15 16 Before the Court is the Verified Petition for Return of the Child to Singapore (the **17** "Petition") filed by the Petitioner, Prasanna Sankaranarayanan (the "Petitioner"), against the 18 Respondent, Dhivya Sashidhar (the "Respondent") pursuant to The Hague Convention on the Civil 19 Aspects of International Child Abduction and the International Child Abduction Remedies Act 20 ("ICARA") [ECF No. 1]. On December 3, 2024, Petitioner submitted the Child's U.S. passport to 21 the Clerk of the Court, and a receipt acknowledging this submission has been provided. Upon the 22 23 consent of both parties, as evidenced by the signatures of their respective counsel below, it is 24 hereby: 25 1. **ORDERED,** that both Petitioner and Respondent are prohibited from removing 26

1. **ORDERED,** that both Petitioner and Respondent are prohibited from removing S.A. (the "Child") or causing the Child to be removed from the jurisdiction of this Court, pending final disposition of the above referenced Petition; and it is further

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2. **ORDERED,** that Petitioner shall surrender any and all of the Child's passports in his possession, custody and/or control to the Court on an expedited basis. If passports are not in Petitioner's possession, he must submit a sworn statement that he has exhausted all methods of search for the passports and did not result in finding them. If Petitioner later locates the passports, he must expeditiously submit them to the Court at that time.

DATED at \_\_:\_ this \_\_ day of December 2024.

BY THE COURT:

RICHARD A. JONES CHIEF JUDGE

## SEEN AND APPROVED AS TO FORM AND CONTENT: 1 2 /s/Roni Ordell /s/ Katelyn Skinner 3 Roni E. Ordell, WSBA #42690 Katelyn Skinner Katrina Seipel Whitaker Kent Ordell, PLLC 4 1200 5th Avenue, Suite 2020 Buckley Law, P.C. Seattle, 5300 Meadows Road WA 98101 5 Telephone: (206) 382-0000 Suite 200 Fax: (206) 382-9109 Lake Oswego, OR 97035 6 Telephone: 503-620-8900 r.ordell@wkolaw.com 7 Fax: 503-620-4878 kds@buckley-law.com 8 kas@buckley-law.com 9 /s/Richard Min Richard Min, (Pro Hac Vice) **10** Michael Banuchis, (Pro Hac Vice) 11 Green Kaminer Min & Rockmore LLP 420 Lexington Avenue, Suite 2821 12 New York, New York 10170 Telephone: (212) 681-6400 13 Fax: (212) 681-6999 14 rmin@gkmrlaw.com mbanuchis@gkmrlaw.com 15 Attorneys for Petitioner Attorneys for Respondent 16 PRASANNA SANKARANARAYANAN DHIVYA SASHIDHAR **17** 18 19 20 21 22 23 24 25 26 27

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